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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

In Re:	§	
Billy Bryant Greenroyd	§	Case No. 09-70645-hdh-13
Sharon Lea Greenroyd	§	Chapter 13
Debtors	§	

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtors, by counsel, and for this Motion state as follows:

1. Debtors filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtors were debtors in a prior case during the preceding year. To-wit: Chapter 13, Case No. 07-70343-HDH-13 filed on 8/16/2007.
3. Debtors seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtors' prior case was dismissed for: Debtor was unemployed until September 17, 2009. He is currently working for Archer Western Contractor LTD, working temporarily. Joint Debtor was laid off October 2, 2009, after the business closed.
5. The following changes of circumstances demonstrate that the Debtor can perform this plan and are likely to complete the case successfully: Debtor is employed and receiving Social Security. He is seeking permanent employment. Joint Debtor is receiving unemployment benefits and she is seeking full time employment.

WHEREFORE, Debtors request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on December 22, 2009 on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtors

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